

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

GREATER MEMPHIS PENTECOSTAL
ASSEMBLY,

Plaintiff,

VS.

CASE NO. _____
JURY DEMANDED

EMPLOYER MUTUAL CASUALTY
COMPANY,

Defendant.

NOTICE OF REMOVAL

Defendant, Employer Mutual Casualty Company, hereby notifies the Judges of the United States District Court for the Western District of Tennessee, the clerk of the Chancery Court of Shelby County, Tennessee and Greater Memphis Pentecostal Assembly, that the action described herein and filed in the Chancery Court of Shelby County, Tennessee, is removed to the United States District Court for the Western District of Tennessee, Western Division pursuant to 28 U.S.C. § 1441.

1. On May 24, 2017, Plaintiff, Greater Memphis Pentecostal Assembly, filed a civil action bearing Docket No. CH-17-0781 - Part 3, against the Defendant, Employer Mutual Casualty Company, in the Chancery Court of Shelby County, Tennessee. Service of the complaint and summons was made upon the Corporation Service Company for the Defendant, by certified mail through the Department of Insurance of the State of Tennessee dated June 2, 2017 and received June 12, 2017.

2. This action is filed by Plaintiff for proceeds allegedly due under a contract of insurance written by Defendant, insuring located at 8941 East Shelby Drive 63, in Shelby County, Memphis, Tennessee, which property was allegedly damaged by severe winds occurring on or about March 3, 2016.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332. Specifically, the complaint alleges that the building and contents were destroyed by fire and that the dwelling was insured for \$500,000.00.

4. Plaintiff is an unincorporated organization in the State of Tennessee and was at the time of the filing of this action and at the time of removal. Defendant, Employer Mutual Casualty Company, is a corporation incorporated in Iowa, with its principal place of business in Des Moines, IA. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number CH-17-0781 is removed from the Chancery Court of Shelby County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/Russell E. Reviere
Russell E. Reviere (07166)
Attorney for Defendant
209 East Main Street
P. O. Box 1147
Jackson, TN 38302-1147
(731) 423-2414

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded first class U.S. Mail, postage prepaid to Robert F. Uhlmann, 5050 Poplar Avenue, Suite 1134, Memphis, TN 38157 counselor of record for Plaintiff, and by electronic means via the Court's electronic filing system.

This the 26th day of June, 2017.

s/ Russell E. Reviere